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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY  
LITIGATION

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

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*Attorneys for Defendant PLAID INC.*

Master Docket No.: 4:20-cv-03056-DMR

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO STAY  
LITIGATION PROCEEDINGS**

Hon. Donna M. Ryu  
Action Filed: May 4, 2020  
Trial Date: None Set

1 Pursuant to Civil Local Rules 7-12 and 6-2, Plaintiffs and Defendant Plaid Inc.  
2 (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as  
3 follows:

4 WHEREAS, on February 11, 2021, the Court set a case schedule through the hearing on  
5 class certification, and scheduled a Further Case Management Conference for July 7, 2021 at  
6 1:30p.m. (ECF No. 120);

7 WHEREAS, the Parties have reached agreement on certain material terms for a  
8 settlement of this case;

9 WHEREAS, the Parties are working to finalize and execute a long form settlement  
10 agreement in the coming weeks, and aim to submit said agreement and supporting preliminary  
11 approval papers to the Court on or before July 29, 2021.

12 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between  
13 the Parties, through their respective counsel and subject to the Court’s approval, that:

- 14 1. All non-settlement proceedings in this action, including all deadlines set forth in the  
15 Court’s February 11, 2021 Order (ECF No. 120), shall be stayed until July 29, 2021.
  - 16 2. If a motion for preliminary approval of class action settlement is filed on or before July  
17 29, 2021, non-settlement proceedings in this action shall remain stayed until further order  
18 of the Court. The Further Case Management Conference scheduled for July 7, 2021 at  
19 1:30p.m. shall be continued until a preliminary settlement approval hearing may be held  
20 on the earliest available date to be noticed upon filing of such papers.
  - 21 3. If no motion for preliminary approval of class action settlement has been filed on or  
22 before July 29, 2021, the stay on non-settlement proceedings shall expire at 11:59 p.m. on  
23 that date. The Further Case Management Conference scheduled for July 7, 2021 at  
24 1:30p.m. shall be continued to August 11, 2021 at 1:30p.m., or as soon thereafter as is  
25 convenient for the Court.
- 26  
27  
28

1 Dated: June 16, 2021

/s/ Rachel Geman

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*Counsel for Defendant Plaid Inc.*

Pursuant to Stipulation, **IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Donna M. Ryu

**Filer's Attestation**

In accordance with Civil Local Rule 5-1(i)(3), the filer of this document hereby attests that the concurrence to the filing of this document has been obtained from counsel for Defendant Plaid Inc.

Dated: June 16, 2021

/s/ Rachel Geman

Rachel Geman

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